

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

Valerie M. Verduce, Catherine Day, and
Anthony Pollock, individually and on behalf
of all others similarly situated,

Plaintiffs

vs.

Vanguard Chester Funds, Mortimer J.
Buckley, Christine M. Buchanan, John E.
Schadl, Tara Bunch, Emerson U. Fullwood,
Amy Gutmann, F. Joseph Loughrey, Mark
Loughridge, Scott C. Malpass, Deanna
Mulligan, André F. Perold, Sarah Bloom
Raskin, David Thomas, Peter F. Volanakis,
and The Vanguard Group, Inc.,

Defendants

Civil Case No. 2:22-cv-00955-ER

**VOLUNTARY DISMISSAL OF SOLELY DEFENDANTS TARA BUNCH AND DAVID
THOMAS**

“In light of [] Third Circuit precedent, Rule 41 is the preferred method for dismissal of all claims against one defendant in a multi-defendant case.” *Durant v. Sofranko*, 2019 U.S. Dist. LEXIS 116733, at *2 (W.D. Pa. July 15, 2019) (collecting authority). Under Rule 41(a)(1)(A)(i), Plaintiffs hereby voluntarily dismiss (without prejudice) all claims against Defendants Tara Bunch and David Thomas. Ms. Bunch and Mr. Thomas have not filed an answer or motion for summary judgment in this case. For the avoidance of doubt, no other above-captioned Defendant is dismissed and all claims against all other above-captioned Defendants remain in the case.

Dated: April 20, 2022

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